

**Harrison, Frank**

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**From:** Harrison, Frank  
**Sent:** Friday, May 21, 2021 5:22 PM  
**To:** Andrew K. Glenn  
**Cc:** Olga L. Fuentes; Marissa E. Miller; Paslawsky, Alexandra; Ingerman, Brett  
**Subject:** RE: Ambac/Milliman Rule 2004 Discovery

I'm not confused about the request for priority – only the reasons you think you need the internal documents, but hopefully you can clear that up for us. I'll send an invite shortly.

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**From:** Andrew K. Glenn <aglenn@glennagre.com>  
**Sent:** Friday, May 21, 2021 4:35 PM  
**To:** Harrison, Frank <FHarrison@williamskastner.com>  
**Cc:** Olga L. Fuentes <ofuentes@glennagre.com>; Marissa E. Miller <mmiller@glennagre.com>; Paslawsky, Alexandra <APaslawsky@milbank.com>; Ingerman, Brett <brett.ingerman@dlapiper.com>  
**Subject:** Re: Ambac/Milliman Rule 2004 Discovery

We are available on Wednesday at 4 p.m.

You continue to confuse our request to prioritize production of certain documents as some kind of limitation on what Ambac may seek pursuant to its subpoena. It isn't. We are standing on these requests and have never waived them. As you've stated below, we've awaited a full production from Milliman since November and still do not have the limited universe of documents you've agreed to produce.

All rights reserved.

Andrew K. Glenn  
Managing Partner  
Glenn Agre Bergman & Fuentes LLP  
55 Hudson Yards  
20th Floor  
New York, New York 10001

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**From:** Harrison, Frank <[FHarrison@williamskastner.com](mailto:FHarrison@williamskastner.com)>  
**Sent:** Friday, May 21, 2021 6:18 PM  
**To:** Andrew K. Glenn <[aglenn@glennagre.com](mailto:aglenn@glennagre.com)>  
**Cc:** Olga L. Fuentes <[ofuentes@glennagre.com](mailto:ofuentes@glennagre.com)>; Marissa E. Miller <[mmiller@glennagre.com](mailto:mmiller@glennagre.com)>; Paslawsky, Alexandra <[APaslawsky@milbank.com](mailto:APaslawsky@milbank.com)>; Ingerman, Brett <[brett.ingerman@dlapiper.com](mailto:brett.ingerman@dlapiper.com)>  
**Subject:** RE: Ambac/Milliman Rule 2004 Discovery

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Andrew:

This is the first you've raised the question of internal correspondence since November (when you sent me the same requests as the subpoena). As with the other requests, I would like to know more about the relevance and proportionality of such documents. Please let us know if either Wednesday 1-3 PM PT / 4-6 ET or Thursday 11-2 PT / 2-5 ET work to meet and confer.

Frank

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**From:** Andrew K. Glenn <[aglenn@glennagre.com](mailto:aglenn@glennagre.com)>  
**Sent:** Wednesday, May 19, 2021 2:07 PM  
**To:** Harrison, Frank <[FHarrison@williamskastner.com](mailto:FHarrison@williamskastner.com)>  
**Cc:** Olga L. Fuentes <[ofuentes@glennagre.com](mailto:ofuentes@glennagre.com)>; Marissa E. Miller <[mmiller@glennagre.com](mailto:mmiller@glennagre.com)>; Paslawsky, Alexandra <[APaslawsky@milbank.com](mailto:APaslawsky@milbank.com)>  
**Subject:** Re: Ambac/Milliman Rule 2004 Discovery

Frank:

You are well aware that the six specific requests we provided were those we chose to prioritize as a starting point. You are also well aware that we moved to compel Milliman to meet and confer with us in good faith on further discovery. Our subpoena unequivocally calls for internal correspondence.

Accordingly, please confirm whether you will produce internal correspondence, and if not, your basis for withholding it.

On May 19, 2021, at 12:39 PM, Harrison, Frank <[FHarrison@williamskastner.com](mailto:FHarrison@williamskastner.com)> wrote:

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No. That is not something we have ever discussed and definitionally not what you asked for.

Frank

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**From:** Andrew K. Glenn <[aglenn@glennagre.com](mailto:aglenn@glennagre.com)>  
**Sent:** Wednesday, May 19, 2021 9:14 AM  
**To:** Harrison, Frank <[FHarrison@williamskastner.com](mailto:FHarrison@williamskastner.com)>  
**Cc:** Olga L. Fuentes <[ofuentes@glennagre.com](mailto:ofuentes@glennagre.com)>; Marissa E. Miller <[mmiller@glennagre.com](mailto:mmiller@glennagre.com)>; Paslawsky, Alexandra <[APaslawsky@milbank.com](mailto:APaslawsky@milbank.com)>  
**Subject:** Re: Ambac/Milliman Rule 2004 Discovery

Thanks for the update. We note that you have not produced any internal Milliman e-mails. Will this this next production include those?

Thanks.

Andrew K. Glenn  
Managing Partner  
Glenn Agre Bergman & Fuentes LLP  
55 Hudson Yards  
20th Floor  
New York, New York 10001

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**From:** Harrison, Frank <[FHarrison@williamskastner.com](mailto:FHarrison@williamskastner.com)>  
**Sent:** Wednesday, May 19, 2021 12:12 PM  
**To:** Andrew K. Glenn <[aglenn@glennagre.com](mailto:aglenn@glennagre.com)>  
**Cc:** Olga L. Fuentes <[ofuentes@glennagre.com](mailto:ofuentes@glennagre.com)>; Marissa E. Miller <[mmiller@glennagre.com](mailto:mmiller@glennagre.com)>;  
Paslawsky, Alexandra <[APaslawsky@milbank.com](mailto:APaslawsky@milbank.com)>  
**Subject:** RE: Ambac/Milliman Rule 2004 Discovery

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Andrew:

You should have the production next week. I am shooting for Monday or Tuesday. It will consist of more of the same types of e-mails from the prior production, but going forward in time (January 1, 2018-March 17, 2021).

Frank

**Frank S. Harrison**

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**WASHINGTON** OREGON

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**From:** Andrew K. Glenn <[aglenn@glennagre.com](mailto:aglenn@glennagre.com)>  
**Sent:** Tuesday, May 18, 2021 6:51 AM  
**To:** Harrison, Frank <[FHarrison@williamskastner.com](mailto:FHarrison@williamskastner.com)>  
**Cc:** Olga L. Fuentes <[ofuentes@glennagre.com](mailto:ofuentes@glennagre.com)>; Marissa E. Miller <[mmiller@glennagre.com](mailto:mmiller@glennagre.com)>;  
Paslawsky, Alexandra <[APaslawsky@milbank.com](mailto:APaslawsky@milbank.com)>  
**Subject:** Ambac/Milliman Rule 2004 Discovery

Frank:

Milliman's opposition brief represents that Milliman will make an additional production. When can we expect that production and what will it contain?

Thank you.

Andrew K. Glenn  
Managing Partner  
Glenn Agre Bergman & Fuentes LLP  
55 Hudson Yards  
20th Floor  
New York, New York 10001  
(908) 581-3659

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